

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	)	
Plaintiff	)	CRIMINAL ACTION
	)	
v.	)	No. 05-02 Erie
	)	
KEITH ALLEN PROCTOR,	)	
Defendant	)	ELECTRONICALLY FILED

**MOTION TO SEEK PERMISSION TO FILE MOTION TO QUASH TWO SUBPOENAS  
IN A CRIMINAL CASE UNDER SEAL**

Movants EMILY HEERSSSEN, RICHARD REED, and FAMILY SERVICES OF NORTHWEST PENNSYLVANIA, by their attorneys MacDonald, Illig, Jones & Britton LLP, file the following Motion to Seek Permission to File Motion to Quash Two Subpoenas in a Criminal Case under Seal, and state the following in support thereof:

1. On November 2, 2006, the Assistant Federal Public Defender issued two Subpoenas: one to Emily Heerssen and one to Richard Reed.
2. Both Emily Heerssen and Richard Reed are employed as mobile therapists at Family Services of Northwest Pennsylvania.
3. The two Subpoenas issued in the criminal case in the above-referenced matter require movants to produce two complete case files, to include but not limited to, all interview notes, reports, summaries, videotapes, evaluations and records pertaining to two minor children.

4. The two Subpoenas issued in the above-referenced criminal case were filed under seal.

5. Movants intend to file a Motion to Quash Two Subpoenas in a Criminal Case and wish to file the Motion to Quash under seal due to the sensitive nature of the information requested in this matter.

WHEREFORE, movants Emily Heerssen, Richard Reed, and Family Services of Northwest Pennsylvania respectfully request that this Honorable Court enter the attached Order granting the Motion to Seek Permission to File Motion to Quash Two Subpoenas in a Criminal Case Under Seal and enter the attached Order.

Respectfully submitted,

/S/ Catherine Moodey Doyle

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